

SETTLEMENT AGREEMENT BETWEEN
THE UNITED STATES OF AMERICA
AND
DAVIESS COUNTY, KENTUCKY PUBLIC LIBRARY DISTRICT
UNDER THE AMERICANS WITH DISABILITIES ACT
DJ 204-31-68

BACKGROUND

SCOPE OF THE INVESTIGATION

The United States Department of Justice (Department) initiated this matter as a compliance review of Daviess County, Kentucky Public Library District (Library) under title II of the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §§ 12131-12134, and the Department's implementing regulation, 28 C.F.R. Part 35.

The review was conducted by the Disability Rights Section of the Department's Civil Rights Division and focused on the Library's compliance with the following title II requirements:

- to conduct a self-evaluation of its services, policies, and practices by July 26, 1992, and make modifications necessary to comply with the Department's title II regulation, 28 C.F.R. § 35.105;
- to notify applicants, participants, beneficiaries, and other interested persons of their rights and the Library's obligations under title II and the Department's regulation, 28 C.F.R. § 35.106;
- to designate a responsible employee to coordinate its efforts to comply with and carry out the Library's ADA responsibilities, 28 C.F.R. § 35.107(a);
- to establish a grievance procedure for resolving complaints of violations of title II, 28 C.F.R. § 35.107(b);
- to operate each program, service, or activity so that, when viewed in its entirety, it is readily accessible to and usable by individuals with disabilities, 28 C.F.R. § 35.150, by:
- delivery of services, programs, or activities in alternate ways, including, for

example, redesign of equipment, reassignment of services, assignment of aides, home visits, or other methods of compliance or, if these methods are not effective in making the programs accessible,

- physical changes to buildings (required to have been made by January 26, 1995), in accordance with the Department's title II regulation, 28.C.F.R. § 35.151, and the ADA Standards for Accessible Design (Standards), 28 C.F.R. pt. 36, App. A, or the Uniform Federal Accessibility Standards (UFAS), 41 C.F.R. § 101-19.6, App. A.
- to ensure that facilities for which construction or alteration was begun after January 26, 1992, are readily accessible to and usable by people with disabilities, in accordance with 1) the Department's title II regulation and 2) the Standards or UFAS, 28 C.F.R. § 35.151;
- to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others, including furnishing auxiliary aids and services when necessary, 28 C.F.R. § 35.160;
- to provide information for interested persons with disabilities concerning the existence and location of the Library's accessible services, activities, and facilities, 28 C.F.R. § 35.163(a);
- to provide signage at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to information about accessible facilities, 28 C.F.R. § 35.163(b).

The Department limited its review to the Daviess County Public Library, located at 450 Griffith Avenue, Owensboro, Kentucky 42301.

JURISDICTION

1. The ADA applies to the Library because it is a "public entity" as defined by title II. 42 U.S.C. § 12131(1).
2. The Department is authorized under 28 C.F.R. Part 35, Subpart F, to determine the compliance of the Library with title II of the ADA and the Department's title II implementing regulation, to issue findings, and, where appropriate, to negotiate and secure voluntary compliance agreements. Furthermore, the Attorney General is authorized, under 42 U.S.C. § 12133, to bring a civil action enforcing title II of the ADA should the Department fail to secure voluntary compliance pursuant to Subpart F.
3. The parties to this Agreement are the United States of America and the Daviess County Public Library District.
4. In order to avoid the burdens and expenses of an investigation and possible litigation, the

- parties enter into this Agreement.
5. In consideration of, and consistent with, the terms of this Agreement, the Attorney General agrees to refrain from filing a civil suit in this matter regarding all matters contained within this Agreement, except as provided in the section entitled "Implementation and Enforcement."

ACTION TAKEN BY THE LIBRARY

6. The Library has policies of ensuring equal opportunity in employment for qualified persons with disabilities. Specifically, the Library's policies provide that:
- the Library will not discriminate on the basis of disability in its hiring or employment practices;
 - the Library will not ask a job applicant about the existence, nature, or severity of a disability.
 - the Library will make reasonable accommodations for the known physical or mental limitations of a qualified applicant or employee with a disability upon request unless the accommodation would cause an undue hardship on the operation of the Library.
 - the Library will make an individualized assessment of whether a qualified individual with a disability meets selection criteria for employment decisions.
7. The Library has consulted with Norb Ryan, the Kentucky ADA Coordinator, regarding providing reasonable accommodations to a Library employee.
8. The Library has identified sources of qualified sign language and oral interpreters to use in fulfilling requests from the public for sign language or oral interpreters.
9. The Library maintains a collection of recorded books in both cassette tape and CD format.
10. The Library provides homebound delivery of materials to residents who find it difficult to visit the library in person.
11. The Library provides reference services via telephone and e-mail.
12. The Library provides remote access to its catalog and a variety of commercial databases.
13. Library users may reserve and/or renew materials via the Internet and/or a touch tone telephone.

14. The Library maintains a relationship with the Kentucky Library for the Blind and Physically Handicapped, through which access to Braille materials and other recorded materials is provided to library customers.
15. The Library has invited representatives from the Kentucky Library for the Blind and Physically Handicapped to educate Library employees on the needs of the visually-impaired.

REMEDIAL ACTION

NOTIFICATION

16. Within two months of the effective date of this Agreement, the Library will adopt the attached Notice (Attachment A); distribute it to all agency heads; post the Notice on its Internet Home Page; and post copies in conspicuous locations in its public buildings. It will refresh the posted copies, and update the contact information contained on the Notice, as necessary, for the life of this Agreement. Copies will also be provided to any person upon request.
17. Within three months of the effective date of this Agreement, and on yearly anniversaries of this Agreement until it expires, the Library will implement and report to the Department its written procedures for providing information for interested persons with disabilities concerning the existence and location of the Library's accessible programs, services, and activities.

ADA COORDINATOR

18. If, at any time during the life of this Agreement, the Library has 50 or more employees, the Library will appoint or hire an ADA Coordinator. The ADA Coordinator will coordinate the Library's effort to comply with and carry out its responsibilities under the ADA, including any investigation of complaint communicated to it alleging its noncompliance with title II or alleging any actions that would be prohibited under title II. The City/Library will make available to all interested individuals the name, office address, and telephone number of the ADA Coordinator.

GRIEVANCE PROCEDURE

19. If, at any point during the life of this Agreement, the Library has 50 or more employees, the Library will adopt the attached ADA Grievance Procedure (Attachment B), distribute it to all agency heads, and post copies of it in conspicuous locations in each of its public buildings. It will refresh the posted copies, and update the contact information contained on it, as necessary, for the life of the Agreement. Copies will also be provided to any person upon request.

GENERAL EFFECTIVE COMMUNICATION PROVISIONS

20. Within three months of the effective date of this Agreement, the Library will identify sources of real-time transcription services and vendors that can put documents in Braille, and will implement and report to the Department its written procedures, with time frames, for fulfilling requests from the public for sign language or oral interpreters, real-time transcription services, and documents in alternate formats (Braille, large print, cassette tapes, etc.).
21. The Library will take steps to ensure that all appropriate employees are trained and practiced in using the Kentucky Relay Service to make and receive calls.

EMPLOYMENT

22. Within three months of the effective date of this Agreement, the Library will amend its employment policies to provide that the Library will maintain any employee's medical records separate from personnel files and keep them confidential.

WEB-BASED SERVICES AND PROGRAMS

23. Within 1 month of the effective date of this Agreement, and on subsequent anniversaries of the effective date of this Agreement, the Library will distribute to all persons – employees and contractors – who design, develop, maintain, or otherwise have responsibility for content and format of its website(s) or third party websites used by the Library (Internet Personnel) the technical assistance document, "Accessibility of State and Local Government Websites to People with Disabilities," which is available at www.ada.gov/websites2.htm.
24. Within three months of the effective date of this Agreement, and throughout the life of the Agreement, the Library will do the following:
 - A. Establish, implement, and post online a policy that its web pages will be accessible and create a process for implementation;
 - B. Ensure that all new and modified web pages and content are accessible;
 - C. Develop and implement a plan for making existing web content more accessible;
 - D. Provide a way for online visitors to request accessible information or services by posting a telephone number or e-mail address on its home page; and
 - E. Periodically (at least annually) enlist people with disabilities to test its pages for ease of use.

NEW LIBRARY

25. The Daviess County Public Library, currently located at 450 Griffith Avenue, is being relocated to a new site. Before construction on this site begins, the Library shall submit a complete and detailed set of blueprints, architectural drawings and specifications to the Department. Within a reasonable amount of time, but not to exceed sixty (60) days, the Department will review these materials for compliance with the Standards and submit a report to the Library outlining its findings. Upon receipt of the Department's report, the Library will make the appropriate changes to the drawings and will ensure that the construction of the facility complies with the Standards for new construction.

EXISTING LIBRARY

26. Through its review of the existing library, located at 450 Griffith Avenue, the Department identified a number of elements or features that do not comply with the Standards, including those listed in Attachment K. The Library will share Attachment K with the future owner/occupant of the existing library, and recommend that the future owner/occupant of the existing library take the actions listed in Attachment K in order to ensure that programs, services, and activities operated at that facility are readily accessible to and usable by persons with mobility impairments.

MISCELLANEOUS PROVISIONS

27. Except as otherwise specified in this Agreement, at yearly anniversaries of the effective date of this Agreement until it expires, the Library will submit written reports to the Department summarizing the actions the Library has taken pursuant to this Agreement.
28. Throughout the life of this Agreement, consistent with 28 C.F.R. § 35.133(a), the Library will maintain the accessibility of its programs, activities, services, facilities, and equipment, and will take whatever actions are necessary (such as routine testing of accessibility equipment and routine accessibility audits of its programs and facilities) to do so. This provision does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs. 28 C.F.R. § 35.133(b).
29. Within six months of the effective date of this Agreement, the Library will develop or procure a two-hour training program on the requirements of the ADA and appropriate ways of serving persons with disabilities. The Library will use the ADA technical assistance materials developed by the Department and will consult with interested persons, including individuals with disabilities, in developing or procuring the ADA training program.
30. Within one year of the effective date of this Agreement, the Library will deliver its training program to all Library employees who have direct contact with members of the public. At the end of that period, the Library will submit a copy of its training curriculum

and materials to the Department, along with a list of employees trained and the name, title, and address of the trainer.

IMPLEMENTATION AND ENFORCEMENT

31. If at any time the Library desires to modify any portion of this Agreement because of changed conditions making performance impossible or impractical or for any other reason, it will promptly notify the Department in writing, setting forth the facts and circumstances thought to justify modification and the substance of the proposed modification. Until there is written Agreement by the Department to the proposed modification, the proposed modification will not take effect. These actions must receive the prior written approval of the Department, which approval will not be unreasonably withheld or delayed.
32. The Department may review compliance with this Agreement at any time. If the Department believes that the Library has failed to comply in a timely manner with any requirement of this Agreement without obtaining sufficient advance written agreement with the Department for a modification of the relevant terms, the Department will so notify the Library in writing and it will attempt to resolve the issue or issues in good faith. If the Department is unable to reach a satisfactory resolution of the issue or issues raised within 30 days of the date it provides notice to the Library, it may institute a civil action in federal district court to enforce the terms of this Agreement, or it may initiate appropriate steps to enforce title II.
33. For purposes of the immediately preceding paragraph, it is a violation of this Agreement for the Library to fail to comply in a timely manner with any of its requirements without obtaining sufficient advance written agreement with the Department for an extension of the relevant time frame imposed by the Agreement.
34. Failure by the Department to enforce this entire Agreement or any provision thereof with regard to any deadline or any other provision herein will not be construed as a waiver of the Department's right to enforce other deadlines and provisions of this Agreement.
35. This Agreement is a public document. A copy of this document or any information contained in it will be made available to any person by the Library or the Department on request.
36. This Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or agents of either party, that is not contained in this written Agreement (including its Attachments, which are hereby incorporated by reference), will be enforceable. This Agreement does not purport to remedy any other potential violations of the ADA or any other federal law. This Agreement does not affect the Library's continuing responsibility to comply with all aspects of the ADA and section 504 of the

Rehabilitation Act.

37. This Agreement will remain in effect for three years.
38. The person signing for the Library represents that he or she is authorized to bind the Library to this Agreement.
39. The effective date of this Agreement is the date of the last signature below.

For the Daviess County Public Library
District:

By:


FRANK A. BRANCATO

President

Board of Trustees

Daviess County Public Library

District

450 Griffith Avenue

Owensboro, KY 42301

Date:

1-3-06


For the United States:

WAN J. KIM

Assistant Attorney General

Civil Rights Division

By:



JOHN L. WODATCH, Chief

JEANINE WORDEN, Deputy Chief

MARY LOU MOBLEY, Senior Counsel

ERIN MEEHAN RICHMOND, Attorney

MARK J. MAZZ, Architect

MICHELE ANTONIO MALLOZZI, Architect

U.S. Department of Justice

Civil Rights Division

950 Pennsylvania Avenue, N.W.

Disability Rights Section - NYA

Washington, DC 20530

Date:

1-12-06

Attachment A



NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990, Daviess County Public Library District (Library) will not discriminate against qualified individuals with disabilities on the basis of disability in the Library's services, programs, or activities.

Employment: The Library does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the Americans with Disabilities Act (ADA).

Effective Communication: The Library will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the Library programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The Library will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all Library programs, services, and activities. For example, individuals with service animals are welcomed in Library offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a Library program, service, or activity, should contact the office of the Deborah Mesplay, Library Director via telephone at (270) 684-0211 or via e-mail at dmesplay@dcplibrary.org as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Library to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a Library program, service, or activity is not accessible to persons with disabilities should be directed to Deborah Mesplay, Library Director via telephone at (270) 684-0211 or via e-mail at dmesplay@dcplibrary.org

The Library will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Attachment B

Daviess County, Kentucky Public Library District

Grievance Procedure under The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Daviess County, Kentucky Public Library District (Library). The Library Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Library Director
450 Griffith Avenue
Owensboro, KY 42301

Within 15 calendar days after receipt of the complaint, the Library Director or his or her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the Library Director or his or her designee will respond in writing, and where appropriate, in format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Library and offer options for substantive resolution of the complaint.

If the response by the Library Director or his or her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the President of the Board of Trustees or his or her designee.

Within 15 calendar days after receipt of the appeal, the President of the Board of Trustees or his or her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the President of the Board of Trustees or his or her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the Library Director or his or her designee, appeals to the President of the Board of Trustees or his or her designee, and responses from these two offices will be retained by the Library for at least three years.

Attachment K

Attachment K: Program Access in Existing Facilities

The technical requirements and, where appropriate, the scoping requirements of the Standards are used as a guide for determining whether a program or activity held in an existing facility is "readily accessible to and usable by" persons with disabilities and for determining what changes are necessary to make this program or activity accessible if it continues to be provided in the existing facility in question. See 28 C.F.R. §§ 35.150(b)(1), 35.151.

Removal of the following barriers to the facility located at 450 Griffith Avenue, Owensboro, Kentucky, 42301 would ensure that no architectural elements will prevent programs, services, and activities operated in that facility from being readily accessible to and usable by persons with disabilities:

1. **Parking:** Although the parking lot has a total of 55 parking spaces, none is designated as a van accessible space reserved for persons with disabilities; the built-up curb ramp impermissibly extends into the parking space's access aisle; two of the four parking spaces reserved for persons with disabilities lack appropriate signage; and two of the four parking spaces reserved for persons with disabilities do not have access aisles. On the shortest accessible route to the accessible entrance, provide at least 1 van accessible space and 2 standard spaces designated as reserved for people with disabilities. Ensure that standard accessible spaces are a minimum of 96 inches wide and served by access aisles at least 60 inches wide. Ensure that van accessible spaces are a minimum of 96 inches wide and served by access aisles at least 96 inches wide. At all spaces designated as reserved for persons with disabilities, provide vertical signs with the International Symbol of Accessibility located such that they cannot be obstructed by parked vehicles. At van accessible spaces, provide an additional "Van-Accessible" sign located below the International Symbol of Accessibility. Ensure that all spaces and access aisles for persons with disabilities are flat and level, with slopes and cross-slopes not exceeding 1:50 in all directions, and that their surfaces are firm, stable, and slip-resistant. Standards §§ 4.1.2(5), 4.6, 4.30.7(1).
2. **Entrance (2 doors in a series creating a vestibule):** The interior entry door is inaccessible because the pressure required to open the door is 13 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
3. **First Floor Stacks:** Throughout the first floor stacks, foot stools obstruct the accessible route and many of the first floor stacks on the left side have only 32-1/2 inches of clear width. Provide at least 36 inches of clear width between all stacks and provide a clear width of 42 inches between stacks where possible. Standards § 8.5, Fig. 56.

4. Lower Level Kentucky Room

- a. The door to the Kentucky Room is inaccessible because the pressure required to open the door is 10 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
- b. The door to the Kentucky Room is inaccessible because knob hardware is used. Provide a door with hardware that is easy to grasp with one hand and that does not require tight grasping, pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. Standards § 4.13.9.
- c. The door to the Kentucky Room, which is accessed through a front approach, is inaccessible because it has only 16 inches of maneuvering clearance at the latch on the pull side of the door. On the pull side of the door, provide maneuvering clearance at least 60 inches deep and provide a minimum of 18 inches (24 inches is preferred) of maneuvering clearance on the latch side of the door. Standards § 4.13.6, Fig. 25(a).
- d. The door to the Kentucky Room, which is accessed through a front approach and which has both a closer and a latch, is inaccessible because it has zero inches of maneuvering clearance at the latch on the push side due to the placement of a desk. On the push side of the door, provide maneuvering clearance at least 48 inches deep and provide a minimum of 12 inches of maneuvering clearance on the latch side of the door, or remove the closer or the latch. Standards § 4.13.6, Fig. 25(a).
- e. The book stacks are inaccessible because the space between stacks and cabinets is only 26 to 34 inches in places. Provide at least 36 inches of clear width between all stacks and provide a clear width of 42 inches between stacks where possible. Standards § 8.5, Fig. 56.
- f. Computer with software for local history and census data (only one in library) is on a table with only 25 inches of knee clearance. Provide a computer on a table or counter that has clear floor space that is 30 inches wide and 48 inches deep, knee clearance at least 27 inches high, 30 inches wide, and 19 inches deep, and a writing surface between 28 and 34 inches above the finished floor. Standards §§ 4.1.3(18), 4.2.4.1, 4.32.

5. Lower Level Main Library

- a. The door to the lower level main library is inaccessible because the pressure required to open the door is 10 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
- b. The door to the lower level main library is inaccessible because the hardware requires tight pinching. Provide a door with hardware that is easy to grasp with one hand and that does not require tight grasping, pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. Standards § 4.13.9.
- c. The book stacks are inaccessible because the route on the far left side of the room is 34-1/2 inches wide (due to a table) and because the route around the 6 video towers measures approximately 20 inches between the towers and 5-15 inches between the towers and the wall. Provide at least 36 inches of clear width between all stacks and provide a clear width of 42 inches between stacks where possible. Standards § 8.5, Fig. 56.

6. Second Floor Audio Visual Library

- a. The door to the audio visual library is inaccessible because it has a clear opening width of only 29 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.
- b. The door to the audio visual library is inaccessible because the pressure required to open the door is 14 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
- c. The book stacks are inaccessible because the route on the back aisle is 32 inches wide (due to placement of equipment). Provide at least 36 inches of clear width between all stacks and provide a clear width of 42 inches between stacks where possible. Standards § 8.5, Fig. 56.
- d. The computer terminal (containing card catalog) is on a desk with inadequate knee clearance (24 inches). Provide a computer on a table or counter that has clear floor space that is 30 inches wide and 48 inches deep, knee clearance at least 27 inches high, 30 inches wide, and 19 inches deep, and a writing surface between 28 and 34 inches above the finished floor. Standards §§ 4.2.4.1, 4.32.

7. Second Floor Children's Library

- a. The door to the children's library is inaccessible because it has a clear opening width of only 29 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.
- b. The computer terminal (containing card catalog) is on a desk with only 24 inches of knee clearance. Provide a computer on a table or counter that has clear floor space that is 30 inches wide and 48 inches deep, knee clearance at least 27 inches high, 30 inches wide, and 19 inches deep, and a writing surface between 28 and 34 inches above the finished floor. Standards §§ 4.2.4.1, 4.32.

8. Second Floor Auditorium

- a. The auditorium is inaccessible because the pressure required to open the door is 12 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
- b. There is no accessible route connecting the wheelchair seating areas and the stage. Provide an accessible route connecting the wheelchair seating locations to all spaces used by performers. Standards §§ 4.3, 4.33.5.
- c. The auditorium is inaccessible to people with hearing impairments because there is an amplification system but there is no assistive listening system. Provide a permanently installed assistive listening system (ALS) or a portable ALS with an adequate number of electrical outlets or other supplementary wiring necessary to support a portable assistive listening system. Also provide at least 2 receivers for use by the general public and signage indicating their availability. Standards §§ 4.30, 4.33.

9. Women's First Floor Toilet Room (stalls)¹

- a. The door to the women's first floor toilet room is inaccessible because it has a clear opening width of only 30-3/4 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.

¹ None of the toilet rooms in the library have a toilet that is accessible to wheelchair users.

- b. No accessible mirror has been provided. Provide a mirror with the bottom edge of its reflecting surface no more than 40 inches above the finished floor. Standards § 4.19.6.
- c. The lavatory is inaccessible because the hot water pipes are not insulated or otherwise configured to protect against contact. Provide hot water and drain pipes that are insulated or otherwise configured to protect against contact. Standards § 4.19.4.
- d. The lavatory is inaccessible because the faucet style is twist. Provide a lavatory with a faucet that can be operated with 5 pounds of force or less and can be used with one hand and without tight grasping, pinching, or twisting of the wrist (lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs). Standards §§ 4.19.5, 4.27.4.
- e. The air dryer protrudes into the toilet room circulation path and would not be detectable to a blind person using a cane. Provide a circulation path at this location such that no objects with their bottom leading edges measuring between 27 inches and 80 inches above the finished floor protrude more than 4 inches into walks, halls, corridors, passageways, or aisles. Free-standing objects mounted on posts or pylons may overhang 12 inches maximum from 27 inches to 80 inches above the ground or finished floor. Providing a cane-detectable barrier is an acceptable solution. Standards § 4.4.
- f. Although one toilet stall is designed for ambulatory persons with disabilities, there is no toilet stall provided for persons who use wheelchairs. Provide a "standard" accessible toilet stall at least 60 inches wide and at least 59 inches deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards. Standards §§ 4.13, 4.16, 4.17, 4.26, 4.27, Fig. 30.
- g. If the toilet stall for ambulatory persons with disabilities is retained, provide the following:
 - i. The stall is inaccessible because the door to the stall is not outward-swinging and self-closing. Provide a door that is outward-swinging and self-closing. Standard § 4.17.3, Fig. 30.
 - ii. The toilet is inaccessible because the toilet is not centered within the stall. Provide a toilet that is centered within the stall. Standard § 4.17.3, Fig. 30.

- iii. No accessible coat hook has been provided. Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair. Standards §§ 4.25.2, 4.25.3, 4.2.4, 4.2.5, 4.2.6.
- iv. The toilet paper dispenser is inaccessible because it is mounted 42 inches from the rear wall. Provide a toilet paper dispenser that is mounted with its top at least 1½ inches under the side grab bar and 36 inches or less from the rear wall and is centered at least 19 inches above the finished floor. Standards § 4.17.3, Fig. 30(d).
- v. The side grab bars are inaccessible because their farther ends are 45 inches from the rear wall. Provide side grab bars that have an overall length of at least 42 inches and are mounted so that the farther ends are at least 54 inches from the rear wall and the closer ends are 12 inches or less from the rear wall. Standard § 4.17.3, Fig. 30.

10. Men's First Floor Toilet Room (stalls)

- a. The door to the men's first floor toilet room is inaccessible because it has a clear opening width of only 30-3/4 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.
- b. No accessible mirror has been provided. Provide a mirror with the bottom edge of its reflecting surface no more than 40 inches above the finished floor. Standards § 4.19.6.
- c. The lavatory is inaccessible because the bottom edge of the lavatory apron is 27-3/4 inches above the finished floor. Provide a lavatory with the top of its rim or counter 34 inches or less above the finished floor; the bottom edge of the apron at least 29 inches above the finished floor; and knee and toe clearances that comply with Fig. 31. Standards § 4.19.2, Fig. 31.
- d. The lavatory is inaccessible because the hot water pipes are not insulated or otherwise configured to protect against contact. Provide hot water and drain pipes that are insulated or otherwise configured to protect against contact. Standards § 4.19.4.

- e. The lavatory is inaccessible because the faucet style is twist. Provide a lavatory with a faucet that can be operated with 5 pounds of force or less and can be used with one hand and without tight grasping, pinching, or twisting of the wrist (lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs). Standards §§ 4.19.5, 4.27.4.
- f. The air dryer protrudes into the toilet room circulation path and would not be detectable to a blind person using a cane. Provide a circulation path at this location such that no objects with their bottom leading edges measuring between 27 inches and 80 inches above the finished floor protrude more than 4 inches into walks, halls, corridors, passageways, or aisles. Free-standing objects mounted on posts or pylons may overhang 12 inches maximum from 27 inches to 80 inches above the ground or finished floor. Providing a cane-detectable barrier is an acceptable solution. Standards § 4.4.
- g. Although the only toilet stall is designed for ambulatory persons with disabilities, there is no toilet stall provided for persons who use wheelchairs. Provide a "standard" accessible toilet stall at least 60 inches wide and at least 59 inches deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards. Standards §§ 4.13, 4.16, 4.17, 4.26, 4.27, Fig. 30.
- h. If the toilet stall for ambulatory persons with disabilities is retained, provide the following:
 - i. No accessible coat hook has been provided. Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair. Standards §§ 4.25.2, 4.25.3, 4.2.4, 4.2.5, 4.2.6.
 - ii. The toilet paper dispenser is inaccessible because it is mounted 39 inches from the rear wall. Provide a toilet paper dispenser that is mounted with its top at least 1½ inches under the side grab bar and 36 inches or less from the rear wall and is centered at least 19 inches above the finished floor. Standards § 4.17.3, Fig. 30(d).
 - iii. The side grab bars are inaccessible because their farther ends are 45-46 inches from the rear wall. Provide side grab bars that have an overall length of at least 42 inches and are mounted so that the farther ends are at

least 54 inches from the rear wall and the closer ends are 12 inches or less from the rear wall. Standard § 4.17.3, Fig. 30.

11. Men's Second Floor Toilet Room (stalls)

- a. The door to the men's second floor toilet room is inaccessible because it has a clear opening width of only 29-1/2 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.
- b. The door to the men's first second toilet room is inaccessible because the pressure required to open the door is 15 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
- c. The door to the men's second floor toilet room, which is accessed from the latch side of the door, is inaccessible because it has only 35 inches of clear depth at the latch on the pull side of the door. On the pull side of the door, provide a path of travel at least 48 inches wide for a side approach and at least 24 inches of clear maneuvering space adjacent to the latch side of the door. Standards § 4.13.6, Fig. 25©.
- d. No accessible mirror has been provided. Provide a mirror with the bottom edge of its reflecting surface no more than 40 inches above the finished floor. Standards § 4.19.6.
- e. The lavatory is inaccessible because the hot water pipes are not insulated or otherwise configured to protect against contact. Provide hot water and drain pipes that are insulated or otherwise configured to protect against contact. Standards § 4.19.4.
- f. The lavatory is inaccessible because the faucet style is twist. Provide a lavatory with a faucet that can be operated with 5 pounds of force or less and can be used with one hand and without tight grasping, pinching, or twisting of the wrist (lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs). Standards §§ 4.19.5, 4.27.4.
- g. The lavatory is inaccessible because the urinal partition interferes with the clear floor space at the lavatory. Provide a lavatory with clear floor space at least 30 inches wide and 48 inches deep centered on the lavatory. Standards § 4.19.3, Fig. 32.

- h. The air dryer protrudes into the toilet room circulation path and would not be detectable to a blind person using a cane. Provide a circulation path at this location such that no objects with their bottom leading edges measuring between 27 inches and 80 inches above the finished floor protrude more than 4 inches into walks, halls, corridors, passageways, or aisles. Free-standing objects mounted on posts or pylons may overhang 12 inches maximum from 27 inches to 80 inches above the ground or finished floor. Providing a cane-detectable barrier is an acceptable solution. Standards § 4.4.
- i. Although the only toilet stall is designed for ambulatory persons with disabilities, there is no toilet stall provided for persons who use wheelchairs. Provide a "standard" accessible toilet stall at least 60 inches wide and at least 59 inches deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards. Standards §§ 4.13, 4.16, 4.17, 4.26, 4.27, Fig. 30.
- j. If the toilet stall for ambulatory persons with disabilities is retained, provide the following:
 - i. No accessible coat hook has been provided. Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair. Standards §§ 4.25.2, 4.25.3, 4.2.4, 4.2.5, 4.2.6.
 - ii. The side grab bars are inaccessible because their farther ends are 45-46 inches from the rear wall. Provide side grab bars that have an overall length of at least 42 inches and are mounted so that the farther ends are at least 54 inches from the rear wall and the closer ends are 12 inches or less from the rear wall. Standard § 4.17.3, Fig. 30.

12. Women's Second Floor Toilet Room (stalls)

- a. The door to the women's second floor toilet room is inaccessible because it has a clear opening width of only 29-1/2 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.

- b. The door to the women's first second toilet room is inaccessible because the pressure required to open the door is 12 pounds. Provide a door that requires no more than 5 pounds of force to open. Standards § 4.13.11(2)(b).
- c. The door to the women's second floor toilet room, which is accessed through a front approach, is inaccessible because it has less than 18 inches of maneuvering space at the latch on the pull side of the door. On the pull side of the door, provide maneuvering clearance at least 60 inches deep and provide a minimum of 18 inches (24 inches is preferred) of maneuvering clearance on the latch side of the door. Standards § 4.13.6, Fig. 25(a).
- d. No accessible mirror has been provided. Provide a mirror with the bottom edge of its reflecting surface no more than 40 inches above the finished floor. Standards § 4.19.6.
- e. The lavatory is inaccessible because the hot water pipes are not insulated or otherwise configured to protect against contact. Provide hot water and drain pipes that are insulated or otherwise configured to protect against contact. Standards § 4.19.4.
- f. The lavatory is inaccessible because the faucet style is twist. Provide a lavatory with a faucet that can be operated with 5 pounds of force or less and can be used with one hand and without tight grasping, pinching, or twisting of the wrist (lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs). Standards §§ 4.19.5, 4.27.4.
- g. The air dryer protrudes into the toilet room circulation path and would not be detectable to a blind person using a cane. Provide a circulation path at this location such that no objects with their bottom leading edges measuring between 27 inches and 80 inches above the finished floor protrude more than 4 inches into walks, halls, corridors, passageways, or aisles. Free-standing objects mounted on posts or pylons may overhang 12 inches maximum from 27 inches to 80 inches above the ground or finished floor. Providing a cane-detectable barrier is an acceptable solution. Standards § 4.4.
- h. Although 1 of the 2 toilet stall is configured for ambulatory persons with disabilities, there is no stall provided for persons who use wheelchairs. Provide a "standard" accessible toilet stall at least 60 inches wide and at least 59 inches deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards. Standards §§ 4.13, 4.16, 4.17, 4.26, 4.27, Fig. 30.

- i. If the toilet stall for ambulatory persons with disabilities is retained, provide the following:
 - i. No accessible coat hook has been provided. Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair. Standards §§ 4.25.2, 4.25.3, 4.2.4, 4.2.5, 4.2.6.
 - ii. The toilet paper dispenser is inaccessible because it is mounted 39 inches from the rear wall. Provide a toilet paper dispenser that is mounted with its top at least 1½ inches under the side grab bar and 36 inches or less from the rear wall and is centered at least 19 inches above the finished floor. Standards § 4.17.3, Fig. 30(d).
 - iii. The side grab bars are inaccessible because their farther ends are 46 inches from the rear wall. Provide side grab bars that have an overall length of at least 42 inches and are mounted so that the farther ends are at least 54 inches from the rear wall and the closer ends are 12 inches or less from the rear wall. Standard § 4.17.3, Fig. 30.

13. Girl's Toilet Room in Children's Library (single user)

- a. The door to the girl's toilet room in the children's library is inaccessible because it has a clear opening width of only 31 inches. Provide a door with a clear opening of 32 inches with the door open 90 degrees, measured between the face of the door and the opposite stop. Standards § 4.13.5, Fig. 24.
- b. The door to the girl's toilet room in the children's library is inaccessible because knob hardware is used. Provide a door with hardware that is easy to grasp with one hand and that does not require tight grasping, pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. Standards § 4.13.9.
- c. The door to the door to the girl's toilet room in the children's library, which is accessed through a front approach, is inaccessible because it has only 13-1/2 inches of maneuvering clearance at the latch on the pull side of the door. On the pull side of the door, provide maneuvering clearance at least 60 inches deep and provide a minimum of 18 inches (24 inches is preferred) of maneuvering clearance on the latch side of the door. Standards § 4.13.6, Fig. 25(a).

- d. The toilet room door swings into the required clear floor space at the lavatory. Ensure that no door swings into the required clear floor space at any accessible fixture. Standards § 4.22.2. Alternatively, provide an accessible door lock.
 - e. No accessible mirror has been provided. Provide a mirror with the bottom edge of its reflecting surface no more than 40 inches above the finished floor. Standards § 4.19.6.
 - f. The lavatory is inaccessible because the bottom edge of the lavatory apron is 26-1/2 inches above the finished floor. Provide a lavatory with the top of its rim or counter 34 inches or less above the finished floor; the bottom edge of the apron at least 29 inches above the finished floor; and knee and toe clearances that comply with Fig. 31. Standards § 4.19.2, Fig. 31.
 - g. The lavatory is inaccessible because the hot water pipes are not insulated or otherwise configured to protect against contact. Provide hot water and drain pipes that are insulated or otherwise configured to protect against contact. Standards § 4.19.4.
 - h. The lavatory is inaccessible because the faucet style is twist. Provide a lavatory with a faucet that can be operated with 5 pounds of force or less and can be used with one hand and without tight grasping, pinching, or twisting of the wrist (lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs). Standards §§ 4.19.5, 4.27.4.
 - i. There are no grab bars at the toilet. Provide a rear grab bar that is at least 36 inches in overall length, with the closer end no more than 6 inches from the side wall, and a side grab bar that is at least 40 inches in overall length, with the far end mounted at least 54 inches from the rear wall and the closer end 12 inches or less from the rear wall. Ensure that the grab bars are mounted 33 to 36 inches above the finished floor; with a diameter between 1¼ and 1½ inches; with 1½ inches between the grab bar and the wall; and at least 1½ inches between the grab bar and any object beside or below it and at least 18 inches between the grab bar and any object above it. Standards §§ 4.17.6, 4.26.2, Figs. 30, 39.
14. Boy's Bathroom in Children's Library (single user)
- a. The route from the children's library to the boy's toilet room is inaccessible because the route is only 33 inches wide, due to the placement of a bookcase. Provide at least one accessible route within the boundary of the site connecting these elements that, to the maximum extent feasible, coincides with the route for

the general public. The accessible route must have a minimum clear width of 36 inches, or a minimum clear width of 42 inches if there is a turn around an obstruction less than 48 inches wide; have passing spaces at least 60 inches by 60 inches at least every 200 feet; have a minimum clear headroom of 80 inches; have a surface that is firm, stable, and slip resistant; have, in the absence of a curb ramp, ramp, elevator, or platform lift, no level changes in excess of ½ inch vertically; and have a running slope of less than 1:20 (5%) (or have been constructed as a fully accessible ramp) and a cross slope of less than 1:50 (2%). Standards §§ 4.3, 4.5, Fig. 7.

- b. The door to the boy's toilet room in the children's library is inaccessible because knob hardware is used. Provide a door with hardware that is easy to grasp with one hand and that does not require tight grasping, pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. Standards § 4.13.9.
- c. The door to the door to the boy's toilet room in the children's library, which is accessed through a front approach, is inaccessible because it has only 10 inches of maneuvering clearance at the latch on the pull side of the door. On the pull side of the door, provide maneuvering clearance at least 60 inches deep and provide a minimum of 18 inches (24 inches is preferred) of maneuvering clearance on the latch side of the door. Standards § 4.13.6, Fig. 25(a).
- d. The toilet room door swings into the required clear floor space at the lavatory and toilet. Ensure that no door swings into the required clear floor space at any accessible fixture. Standards § 4.22.2. Alternatively, provide an accessible door lock.
- e. No accessible mirror has been provided. Provide a mirror with the bottom edge of its reflecting surface no more than 40 inches above the finished floor. Standards § 4.19.6.
- f. The lavatory is inaccessible because the bottom edge of the lavatory apron is 26-1/2 inches above the finished floor. Provide a lavatory with the top of its rim or counter 34 inches or less above the finished floor; the bottom edge of the apron at least 29 inches above the finished floor; and knee and toe clearances that comply with Fig. 31. Standards § 4.19.2, Fig. 31.
- g. The lavatory is inaccessible because the hot water pipes are not insulated or otherwise configured to protect against contact. Provide hot water and drain pipes that are insulated or otherwise configured to protect against contact. Standards § 4.19.4.

- h. The lavatory is inaccessible because the faucet style is twist. Provide a lavatory with a faucet that can be operated with 5 pounds of force or less and can be used with one hand and without tight grasping, pinching, or twisting of the wrist (lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs). Standards §§ 4.19.5, 4.27.4.
- i. There are no grab bars at the toilet. Provide a rear grab bar that is at least 36 inches in overall length, with the closer end no more than 6 inches from the side wall, and a side grab bar that is at least 40 inches in overall length, with the far end mounted at least 54 inches from the rear wall and the closer end 12 inches or less from the rear wall. Ensure that the grab bars are mounted 33 to 36 inches above the finished floor; with a diameter between $1\frac{1}{4}$ and $1\frac{1}{2}$ inches; with $1\frac{1}{2}$ inches between the grab bar and the wall; and at least $1\frac{1}{2}$ inches between the grab bar and any object beside or below it and at least 18 inches between the grab bar and any object above it. Standards §§ 4.17.6, 4.26.2, Figs. 30, 39.

15. Elevator

- a. The elevator is inaccessible because the hall call buttons are centered at 54 inches above the finished floor. Provide hall (lobby) call buttons with visual signals indicating when each call is registered and when each call is answered. Ensure that the call buttons are centered at 42 inches above the finished floor, a minimum of $\frac{3}{4}$ inch in the smallest dimension, with the button designating the up direction on top; that the call buttons are raised or flush; and that objects mounted beneath hall call buttons do not project into the elevator lobby more than 4 inches. Standards § 4.10.3, Fig. 20.
- b. The elevator is inaccessible because there are no hall lanterns. Provide hall lanterns at each hoistway entrance that emit a visible and audible signal indicating which car is answering a call. Ensure that audible signals sound once for the up direction and twice for the down direction or have verbal annunciators that say "up" or "down;" and that visible signals are mounted so that their centerline is at least 72 inches above the lobby floor, they are at least $2\frac{1}{2}$ inches in the smallest dimension, and they are visible from the vicinity of the hall call button. Lanterns located in cars, visible from the vicinity of hall call buttons, and conforming to the above requirements, are acceptable. Standards § 4.10.4, Fig. 20.
- c. The elevator is inaccessible because it does not automatically reopen if it is obstructed. Provide doors that open and close automatically with a reopening device that will stop and reopen the car door and hoistway door automatically if the door becomes obstructed by an object or person. Ensure that the device is

capable of completing these operations without requiring contact for obstructions passing through the opening at heights of 5 inches and 29 inches above the finished floor; that door reopening devices remain effective for at least 20 seconds, after which the doors may close; that the minimum time from notification that a car is answering a call until the doors of that car start to close is 5 seconds; and that the minimum time for elevator doors to remain fully open in response to a car call is 3 seconds. Standards §§ 4.10.6, 4.10.7, 4.10.8, Figs. 20, 21.

- d. The elevator is inaccessible because the car control buttons do not have Braille and raised characters to the left of buttons, the main entry floor call button is not designated by a raised star, the floor buttons do not have visual indicators to register call, the highest floor button is 58 inches above the finished floor, and the centerline of the emergency call button is more than 35 inches above the finished floor. Provide car control buttons that are at least $\frac{3}{4}$ inch in their smallest dimension and are raised or flush and that are designated by Braille and by raised standard alphabet characters for letters, arabic characters for numerals, or standard symbols. Ensure that the call button for the main entry floor is designated by a raised star at the left of the floor designation; that all raised designations for control buttons are placed immediately to the left of the buttons to which they apply; that floor buttons are provided with visual indicators to show when each call is registered and are extinguished when each call is answered; that all floor buttons are no higher than 54 inches above the finished floor for a side approach and no more than 48 inches above the finished floor for a front approach; and that emergency controls, including the emergency alarm and emergency stop, are grouped at the bottom of the panel and have their centerlines no less than 35 inches above the finished floor. Standards § 4.10.12, Fig. 23.
- e. The elevator is inaccessible because the car position does not ring as the car passes or stops on floors. Provide visual car position indicators above the car control panel or over the door to show the position of the elevator in the hoistway. Ensure that indicators emit an audible and visual signal as the car passes or stops at a floor served by the elevator, with the corresponding floor designation being illuminated; and that numerals are a minimum of $\frac{1}{2}$ inch high. Standards § 4.10.13.

16. Drinking Fountains

- a. First Floor Drinking Fountain (built-in): The “built-in” drinking fountain on the first floor is inaccessible because the clear floor space for a parallel approach is obstructed by stacks. Provide directional signage to the accessible drinking fountain in the children’s library. Standards §§ 4.15.5(2), 4.2.4, Figs. 27©, (d).

- b. Second Floor Drinking Fountain by Office (built-in): The “built-in” drinking fountain on the first floor is inaccessible because the spout height is 41 inches above the finished floor. Provide directional signage to the accessible drinking fountain in the children’s library. Standards §§ 4.15.5(2), 4.2.4, Figs. 27©, (d).
 - c. Second Floor Drinking Fountain in Children’s Library (built-in): The drinking fountain in the children’s library is inaccessible because the controls require 10 pounds of force to operate. Provide a drinking fountain with controls mounted on or near the front edge that are operable with one hand, that require 5 lbf or less to operate, and that can be operated without tight grasping, pinching, or twisting of the wrist. Provide directional signage to the taller drinking fountain located near the library director’s office. Standards §§ 4.15.4, 4.27.4.
18. Although the facility contains an emergency alarm system, the alarm system is inaccessible because visual alarm devices are not located in any toilet rooms, and they are not located in all general usage areas. Provide visual alarm devices in toilet rooms and any other general usage areas (e.g., meeting rooms), hallways, lobbies, and any other area for common use. Such devices shall be integrated into the facility alarm system and shall meet the requirements of the Standards for lamp type, color, pulse duration, intensity, and flash rate. Visual alarm appliances shall be placed 80 inches above the highest floor level within the space or 6 inches below the ceiling, whichever is lower. Visual alarm appliances shall be located such that no place in any room or space, including common corridors or hallways, required to have a visual alarm appliance shall be more than 50 feet from the signal. In large rooms and spaces exceeding 100 feet across, without obstructions 6 feet above the finished floor, devices may be placed around the perimeter, spaced a maximum of 100 feet apart, in lieu of suspending appliances from the ceiling. Standards § 4.28.3.